

Reclamation Manual
Directives and Standards

Bureau of Reclamation Environmental Management Systems (EMS) Conformance Audit Criteria Checklist					
EMS Required Elements	Reclamation Manual (RM) Directive and Standard (D&S), <i>Environmental Management Systems (EMS) Implementation</i> (ENV 05-01) Requirements	Evidence of Conformance	Yes/No - Description of Nonconformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan
Environmental Policy	The Regional Director (RD) shall document his/her commitment to Reclamation's environmental stewardship policy in ENV P05 and shall include region-specific commitments and priorities, as necessary. The RD commitment to RM Policy, <i>The Bureau of Reclamation's Commitment to Environmental Stewardship</i> (ENV P05) shall be communicated to all regional employees annually via memorandum, and to on-site contract employees, operators of Reclamation facilities, key external stakeholders, visitors, and lessees, as deemed appropriate.	<ul style="list-style-type: none">• There is record of a RD memorandum to all employees committing to ENV P05 each year. See also Control of Records.• The objectives of ENV P05 are either included or referenced in the memorandum. If referenced, a link to the Reclamation Manual Web site to view the full policy is provided.• Management and employees understand and support the objectives established by ENV P05.			
Environmental Aspects	The region shall establish and implement procedures to identify, review, and update the environmental aspects and impacts within the defined scope of the EMS. The region shall review current and planned activities, operations, products, and services that it can control or influence to determine its aspects. The region shall review and update (add/delete/modify) environmental aspects and impacts periodically.	<ul style="list-style-type: none">• The EMS manual contains procedures to identify and evaluate environmental aspects within the scope of the regional EMS.• Meetings minutes, reports, lists, registers, or other documentation demonstrate that the procedures were followed and identify the environmental aspects and impacts of core mission activities, products and services. Rationale is provided in meeting minutes, aspect register, EMS manual, or other documents when aspects for core activities have been omitted.• There is evidence that environmental aspects are reviewed and updated (added/deleted/modified) by the appropriate regional staff periodically.• There is evidence that changes to environmental aspects are reviewed and approved by management.			
Identification of Significant Aspects	<p>The region shall establish and implement procedures to determine those aspects that have or can have significant impact on the environment. The region shall develop and apply a ranking scheme to individual aspects to identify the most significant. Ranking schemes may be qualitative or quantitative, but shall consider the following evaluation criteria for analyzing each aspect:</p> <p>(a) relationship to the sustainability goals; (b) scope and severity of environmental and human health impacts; (c) probability and frequency of occurrence; (d) cost and feasibility; (e) level of regional control or influence over the aspect; (f) extent to which the aspect is regulated by local, state, and/or Federal law, or required by Executive order (EO) or other requirements; and (g) interest of third parties.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities to rank the significance of environmental aspects and clearly describes the significance ranking process and criteria.• Meetings minutes, reports, lists, registers, or other documentation demonstrate that the ranking procedures were followed and at least three of the required ranking criteria were applied.• Evidence demonstrates an analysis of the relationship of aspects to the sustainability goals of EO 13423, as amended and supplemented by EO 13514 (e.g., sustainability goals). See also Sustainability Goals.• If a numerical rating system is applied, there is a clear description of the values, their meaning, and how they were applied, including use of numerical thresholds, to determine and rank significance.• Aspects determined to be significant are clearly identified.			
Legal and other Requirements	The region shall establish, implement, and maintain procedures for identifying Federal, state, and local environmental regulations and other environmental requirements and commitments, and determine their applicability to their organization's environmental aspects. The procedures shall include a periodic review of legal and other requirements and the responsibilities and processes for identifying, documenting, and communicating changes.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for identifying and documenting applicable environmental legal requirements, corporate policies, and other environmental requirements, including identifying Federal laws, regulations, and EOs addressing the sustainability goals.• A register, report, matrix, or other document identifies the region's major legal and other environmental requirements and how they relate to the region's aspects. The latest legal and other environmental requirements are tracked, documented, and communicated to applicable staff via appropriate communication vehicles (e.g., Web site, environmental compliance handbook, online environmental regulation tracking service, etc.).• Procedures are in place for identifying state and local requirements at lower levels of the organization.• The region assigns clear responsibility for monitoring, updating, and communicating changes to applicable legal and other environmental requirements at various levels of the organization.			

EMS Required Elements	Reclamation Manual (RM) Directive and Standard (D&S), <i>Environmental Management Systems (EMS) Implementation</i> (ENV 05-01) Requirements	Evidence of Conformance	Yes/No - Description of Nonconformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan
Sustainability Goals	<p>The region shall address the sustainability goals defined in Paragraph 3.N. that are applicable to the region's activities and operations in the following manner:</p> <p>(a) identify the applicable EOs, laws, and regulations mandating accomplishment of the sustainability goals as legal and other requirements; (b) consider the correlation between the sustainability goals and the region's environmental aspects as a criteria for determining significance; (c) consider the sustainability goals in the development of objectives and targets and provide rationale for sustainability goals not addressed in Environmental Management Plans (EMPs); and (d) develop a plan and schedule to include the sustainability goals in the EMS through continual improvement.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for addressing the sustainability goals. The manual identifies the sustainability goals applicable to the region and establishes a timeframe for their inclusion in the EMS or rationale as to why they are not addressed.• Aspect and legal and other requirement registers, significance ranking criteria, EMPs, and other EMS records and documentation demonstrate consideration of the sustainability goals in the development and implementation of the EMS.			
Lessee, Contractor, and Concessionaire Activities	<p>This requirement applies to the acquisition of products and services (e.g., design and construction), concessionaire agreements, lease agreements for use of Reclamation lands, and contracts for third-party operation and maintenance of Reclamation-owned facilities (e.g., transferred works). Where lessee, contractor, and concessionaire activities on Reclamation lands affect Reclamation's environmental aspects, the region shall:</p> <p>(a) address the activities in the EMS, as appropriate; and (b) ensure that new or renewed contracts and agreements specify the lessee, concessionaire, or contractor role and responsibilities to reduce their significant environmental aspects and support ENV P05 in accordance with the applicable program, legal, and contractual requirements.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures to identify the roles, responsibilities, and procedures for identifying and addressing EMS requirements in applicable agreements, leases and contracts.• New or renewed contracts for the operation of Reclamation facilities contain language to meet EMS and EO 13423 and EO 13514 requirements in accordance with RM D&S, <i>Sustainable Operation and Maintenance Requirements for Certain Water-Related Contracts</i> (PEC 05-06).• Other contract, lessee, or concessionaire documents contain environmental requirements in accordance with applicable Federal and Reclamation environmental legal and other requirements (e.g., Reclamation Acquisition Regulations).			
Objectives and Targets	<p>The region shall establish and implement procedures for the development, implementation, and periodic review of environmental objectives and targets. The environmental objectives and targets shall be measureable, realistic, and time-specific, where feasible, and support ENV P05 to promote regulatory compliance, prevent pollution, and improve environmental performance at all levels of the organization. The region shall align objectives and targets to the significant environmental aspects or document the rationale for omitting significant environmental aspects as objectives and targets in the EMS. The region shall consider the following in developing objectives and targets:</p> <p>(a) significant environmental aspects; (b) legal and other requirements, including sustainability goals defined in Paragraph 3.N.; (c) financial, operational, and business requirements; (d) management priorities; and (e) views of interested parties.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities to establish environmental objectives and targets.• Meetings minutes, reports, lists, registers, or other documentation demonstrate that the established procedures and criteria were considered when identifying environmental objectives.• The rationale for selecting current objectives and targets is documented.• Objectives are clearly stated, understandable, and realistic. Targets are quantifiable and time-specific.• Rationale is provided for significant aspects for which objectives and targets are not set in the current EMS cycle.			
Environmental Management Plans	<p>The region shall develop EMPs or similar action plans and programs for each objective and target established in accordance with Paragraph 5.B.(6). The EMP shall document:</p> <p>(a) the environmental objective; (b) related targets, actions, and milestones; (c) roles and responsibilities of regional, program, area office, and other personnel in implementing the objectives and targets; and (d) other information deemed useful by the region such as operational controls, resources, performance indicators (e.g., data), legal and other requirements, training, etc., necessary to implement, measure, manage, and track the objectives and targets.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for developing EMPs. The EMPs address the required elements.• The required EMP information is relevant, up-to-date, communicated to staff, and readily available.• Staff understand their roles and responsibilities for achieving the EMP objectives and targets.• The significant environmental aspects and sustainability goals that an EMP addresses, if applicable, is clearly identified.			

EMS Required Elements	Reclamation Manual (RM) Directive and Standard (D&S), <i>Environmental Management Systems (EMS) Implementation</i> (ENV 05-01) Requirements	Evidence of Conformance	Yes/No - Description of Nonconformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan
Resources, Roles and Responsibilities	To ensure successful implementation of the EMS, the region shall: (a) make available the necessary staff, skills, and technical and financial resources to implement the EMS; (b) define, assign, and communicate EMS roles, responsibilities, and authorities to internal staff and onsite contractors working on behalf of the region (e.g., information technology support technicians), including: (i) responsibilities for implementation and oversight of EMS at various levels of the organization; (ii) responsibilities for management of significant environmental aspects; and (iii) responsibilities for achievement of the environmental objectives and targets.	<ul style="list-style-type: none">• The EMS manual establishes roles and responsibilities for implementing the EMS, including roles and responsibilities for overall management and coordination of the EMS, management of significant environmental aspects, and achievement of objectives and targets.• Staff and managers understand and carry out their roles and responsibilities in relation to EMS implementation.			
Competency, Training and Awareness	The region shall establish and implement procedures to ensure that employees and on-site contractors are competent to implement the EMS and address Reclamation's significant environmental aspects. Regions shall: (a) provide EMS awareness training or other forms of outreach to all regional employees and onsite contractors on a periodic basis to generate understanding of the EMS, the region's significant environmental aspects and related impacts, and the importance of conformance to ENV P05 and regional EMS procedures; (b) identify competency requirements and training needs for employees working in activities or operations with significant environmental aspects; (c) provide training, work experience, or other means to meet competency requirements identified; and (d) verify achievement of competency requirements and retain associated training records.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for identifying training related to EMS and the region's significant environmental aspects.• Employees are aware and have a general understanding of the principles of ENV P05, the regional EMS procedures, and the region's significant environmental aspects and objectives and targets.• The EMS manual, position descriptions, performance plans, individual development plans, or other documentation identify the competency and training requirements for staff working in significant environmental aspects.• Records demonstrate that identified training has been received by appropriate employees at the required frequency.• Staff working on significant environmental aspects demonstrate competency and knowledge to perform their duties in an environmentally sound manner.			
Internal Communication	The region shall establish and implement procedures to communicate information on EMS implementation between organizational levels and functions to ensure successful implementation of the EMS. Information communicated shall include: (a) the principles of ENV P05; (b) the region's EMS procedures, significant environmental aspects, environmental objectives and targets, and EMPs; and (c) the roles and responsibilities of key personnel in implementing the EMS and addressing significant environmental aspects.	<ul style="list-style-type: none">• Memoranda, meeting minutes, notes, online sharing systems (e.g., SharePoint), internet sites, and other means demonstrate communication between key players on EMS. Key players demonstrate knowledge of EMS responsibilities, information, and activities.• Employees receive RD memoranda on his/her commitment to ENV P05. Employees receive information on the region's significant environmental aspects and environmental objectives and targets.			
External Communication	The region shall establish and implement procedures to communicate information on EMS to external stakeholders in the following manner: (a) refer interested external stakeholders to Reclamation's environmental stewardship policy in ENV P05 through the RM Internet site; (b) determine whether or not to communicate the EMS, in whole or in part, to external stakeholders and document their decision; and (c) receive, document, and respond to communication relevant to the EMS from external parties.	<ul style="list-style-type: none">• The public is directed to ENV P05 via the Reclamation Manual Internet site.• The EMS manual documents the region's decision to communicate the EMS to the public and EMS communication reflects that decision.• The EMS manual contains procedures to receive and address external communication on environmental issues. Memorandum, email, and other documentation demonstrate that procedures for responding to the public are followed.			
Documentation	The region shall, at a minimum, document the following EMS information: (a) the commitment to ENV P05; (b) the physical and organizational scope of the region's EMS; (c) the region's significant environmental aspects; (d) the region's EMS objectives and targets; (e) applicable legal and other requirements; and (f) the region's decision to communicate the EMS to external stakeholders.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for the documentation of key EMS information in accordance with Reclamation and regional records management requirements.• The required information is documented either in the EMS manual or other document or in an electronic form. The regional EMS coordinator or other position maintains the documents.			

Reclamation Manual
Directives and Standards

EMS Required Elements	Reclamation Manual (RM) Directive and Standard (D&S), <i>Environmental Management Systems (EMS) Implementation</i> (ENV 05-01) Requirements	Evidence of Conformance	Yes/No - Description of Nonconformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan
Control of Documents	Regions shall ensure that required EMS documents are adequately maintained and controlled so that they are up-to-date, legible, consistent, and available . The procedures for controlling documents must address: (a) approval of final documents prior to distribution; (b) review, update, and re-approval of documents, when necessary; (c) identification and date of document changes and versions; (d) availability and location of current versions; and (e) archiving or eliminating obsolete versions.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for the control of EMS documents described above. Procedures address how documents are created, reviewed, updated, approved, archived, or deleted. There is evidence that the procedures are followed.• The required EMS documents identify dates of management approval, if applicable, and the version of the document from the original.• The latest versions of EMS documents are readily available and obsolete versions are not accessible. Regional staff possess the latest version of documents.			
Operational Controls	The region shall establish and implement procedures and define responsibilities for identifying, establishing, implementing, and maintaining operational controls related to the region's significant environmental aspects. The region shall ensure that the operational controls are understood and carried out by applicable personnel in order to achieve environmental objectives, prevent potential environmental impacts, and avoid deviation from the principles of ENV P05 and the region's environmental objectives and targets.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities to identify, develop, implement, and update operational controls appropriate to the organization's significant environmental aspects.• Policies, D&S, operating procedures, technical guidance documents, and work procedures and practices demonstrate that operations controls are in place for significant environmental aspects and are adequate to ensure that environmental impacts are appropriately managed.• Management and staff working in activities and operations with significant environmental aspects understand, communicate and follow applicable operational controls.			
Emergency Preparedness and Response	The region shall establish, implement, exercise, and maintain emergency response procedures for potential occurrences that can have an environmental impact in accordance with RM D&S, <i>Emergency Management</i> (FAC 01-01). Regional EMS procedures shall reference existing emergency action plans, as appropriate.	<ul style="list-style-type: none">• The EMS manual references FAC 01-01 and related EAP procedures, roles, and responsibilities for developing and exercising emergency action plans.• Emergency action plans include procedures to prevent and/or mitigate the environmental effects associated with accidents and emergencies, respond to actual emergency situations and accidents, and perform periodic testing (where practicable).• Emergency action plans are reviewed and exercised according to an established schedule, as required in FAC 01-01. EAP activities are documented in the Reclamation Dam Safety Information System.• Plans are updated to capture changes in responsibilities, processes, conditions, or facilities.			
Monitoring and Measurement	(1) Monitoring and Measurement. The region shall establish, document, and implement procedures to monitor and measure the key operations related to significant environmental aspects and EMS performance. Monitoring and measurement activities shall include an assessment of: (a) the effectiveness of operational controls in place to reduce environmental impacts associated with significant environmental aspects; (b) performance in achieving the environmental objectives and targets; (c) review of programmatic quality assurance procedures for generating reliable EMS performance data; and (d) the overall effectiveness of the EMS.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities to monitor and measure significant environmental aspects and achievement of EMS objectives and targets.• Reports, reviews, data, calibrations, and work procedures demonstrate monitoring and measurement of the effectiveness of operational controls for significant aspects.• Reports, data call results, briefing materials, and other documents demonstrate monitoring of the accomplishment of objectives and targets on a reoccurring basis.• There is evidence of good quality assurance practices in place for gathering and assessing data related to the environmental objectives and significant environmental aspects.			
Control of Records	The region shall establish procedures to generate, maintain, and control records of EMS performance in accordance with Reclamation and regional record keeping procedures. Procedures shall address how records are generated, stored, protected, retrieved, retained, and disposed. Examples of EMS records that shall be controlled include, but are not limited to: (a) register/matrix ranking the significant aspects; (b) certificates of completion of training related to EMS awareness and significant aspects; (c) minutes, notes or summary reports of the management review; (d) memorandum from the RD committing to ENV P05; (e) status reports on the accomplishment of objectives and targets; (f) records of calibration and quality assurance activities, where applicable; (g) conformance or internal audit reports and records of completed corrective and preventative actions; and (h) environmental compliance reviews, notices of violations and incidence reports.	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for the control of records of EMS activities, as required.• Hard copy or electronic filing systems, online information sharing sites (e.g., SharePoint), and other means demonstrate that the required EMS records are maintained, controlled, accessed, and disposed of in accordance with procedures.• EMS records are readily accessible and up-to-date.			

EMS Required Elements	Reclamation Manual (RM) Directive and Standard (D&S), <i>Environmental Management Systems (EMS) Implementation</i> (ENV 05-01) Requirements	Evidence of Conformance	Yes/No - Description of Nonconformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan
Evaluation of Compliance	The region shall implement an environmental compliance auditing program in accordance RM D&S, <i>Environmental Compliance Audit Program</i> (ENV 02-08), which establishes Reclamation's procedures for reviewing compliance with major Federal environmental laws and regulations.	<ul style="list-style-type: none">• The EMS manual references procedures, roles, and responsibilities for evaluating environmental compliance.• Checklists, reports, and other documentation demonstrate that the region conducts environmental compliance reviews at facilities on an established schedule in accordance with ENV 02-08.• Audit reports document facility-level compliance with environmental regulatory requirements and identify audit findings and recommendations. Corrective and preventive actions are developed and tracked to completion.			
Internal Audit	<p>The region shall conduct periodic assessments to ensure the EMS is functioning and properly implemented and maintained in accordance with this D&S and region-specific EMS procedures. The region shall evaluate itself against the audit criteria specified in Appendix A of RM D&S, <i>Environmental Management System (EMS) Independent Conformance Audit and Declaration of Conformance Process</i> (ENV 05-02). The internal audit must be conducted such that the regional EMS, including representative programs and sub-organizational levels, is reviewed for conformance within 3 years of an independent conformance audit. Internal audit procedures shall address:</p> <p>(a) responsibilities for conducting internal audits; (b) schedule and frequency, including the individual programs and offices scheduled for inclusion in the audits; (c) internal audit approach and methodology ; and (d) procedures for reporting audit results and retaining audit records.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for conducting internal reviews of the EMS and establishes a frequency for such reviews.• Reports, audit checklists, memoranda and other documents demonstrate that internal reviews occurred within 3 years of the independent conformance audit, evaluated regional conformance to the requirements of ENV 05-01 and the respective region's EMS, and identified and documented nonconformities.			
Nonconformity, Corrective and Preventative Actions	<p>The region shall establish, implement, and maintain procedures to identify and correct nonconformities to EMS requirements and prevent their recurrence. Non-conformities shall be identified through monitoring and measurement of the EMS, internal audits, and independent conformance audits. The nonconformity, corrective and preventative action procedure must address how the organization will:</p> <p>(a) identify nonconformities and their root causes; (b) establish and implement corrective and preventative actions to address nonconformities and prevent their recurrence; and (c) evaluate the effectiveness of corrective and preventative actions taken and record their completion.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for identifying nonconformities; developing, implementing, and tracking corrective and preventative actions; and confirming closure of nonconformities.• Reports, audit checklists, action plans, reviews, and other documents demonstrate nonconformities were identified during internal and external audits, monitoring and measurement activities, and management and other reviews, and corrective and preventative actions were developed, implemented, and tracked to completion.			
Management Review	<p>The EMS manager shall plan for and conduct an EMS review with the region's senior leadership annually, to ensure continued suitability, adequacy, and effectiveness of the EMS and reaffirm conformance. The management review shall be documented and include the following topics:</p> <p>(1) EMS-related communication from external parties; (2) changes to EMS-related requirements, if any; (3) status of compliance with environmental regulations and other legal requirements; (4) status and accomplishment of EMS objectives and targets; (5) results of internal audits and independent conformance audits, including nonconformities identified; (6) status of corrective and preventative actions to address nonconformities; (7) review of actions from previous management reviews; (8) status of EMS conformance declarations; and (9) planned actions or decisions for continual improvement.</p>	<ul style="list-style-type: none">• The EMS manual contains procedures, roles, and responsibilities for conducting management reviews and the schedule of occurrence.• Meeting minutes, briefing papers, presentations, and notes demonstrate that the management review includes all required information.• Attendee lists demonstrate that the region's senior level management, as identified in the region's EMS procedures, participated in the management review.• Adequate data in the form of briefing papers or reports are provided to management to ensure that they perform a thorough and effective review.• Meeting minutes and notes record management actions and decisions and are maintained and available.			